

1 William N. Carlon (State Bar No. 305739)  
2 Email: william@carlonlaw.com  
3 LAW OFFICE OF WILLIAM CARLON  
4 437 Post Street  
5 Napa, CA 94559  
6 Phone: (530) 514-4115

7 Barak Kamelgard (State Bar No. 298822)  
8 Email: barak@lawwaterkeeper.org  
9 Benjamin Harris (State Bar No. 313193)  
10 Email: ben@lawwaterkeeper.org  
11 LOS ANGELES WATERKEEPER  
12 360 E 2<sup>nd</sup> Street, Suite 250  
13 Los Angeles, CA 90012  
14 Phone: (310) 394-6162

15 Attorneys for Plaintiff  
16 LOS ANGELES WATERKEEPER

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

16 LOS ANGELES WATERKEEPER, a  
17 California non-profit association,

18 Plaintiff,

19 v.

20 ARCADIA PRODUCTS, LLC, a  
21 Colorado limited liability company,

22 Defendant.

Case No: 2:24-CV-03445-GW-SSC

**NOTICE OF SETTLEMENT**

1 **TO THE CLERK OF THE COURT, ANY INTERESTED PARTIES, AND THEIR**  
2 **ATTORNEYS OF RECORD:**

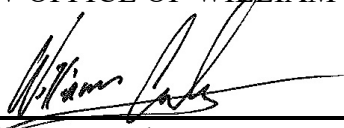
3 PLEASE TAKE NOTICE that Plaintiff Los Angeles Waterkeeper and Defendant  
4 Arcadia Products, LLC, parties in the above-captioned action, have reached settlement and  
5 executed a consent decree. The consent decree is subject to the federal agencies' 45-day  
6 review period.<sup>1</sup>

7 PLEASE TAKE FURTHER NOTICE that, in accordance with federal law, no  
8 judgment disposing of this action may be entered prior to 45 days following the receipt of  
9 the proposed consent decree by the United States Department of Justice and the national and  
10 Region IX offices of the United States Environmental Protection Agency. *See* 40 C.F.R.  
11 § 135.5 (requiring the parties to provide notice to the court of the 45-day agency review  
12 period under 33 U.S.C. § 1365(c)).

13 The regulatory agencies' review period will end on or about November 30, 2024. If  
14 the reviewing agencies do not object to the proposed consent decree, Plaintiff will file a  
15 notice of non-objection on or about that date and request entry of the consent decree; if any  
16 of the reviewing agencies do object, the parties would require additional time to meet and  
17 confer and attempt to resolve the agencies' concerns, and the Court will be so notified.

18 Date: October 16, 2024

LAW OFFICE OF WILLIAM CARLON

19   
20 \_\_\_\_\_  
21 William N. Carlon  
22 Attorneys for Plaintiff  
23 Los Angeles Waterkeeper  
24  
25  
26

27 \_\_\_\_\_  
28 <sup>1</sup> Title 33 of the United States Code Section 1365(c) provides that "[n]o consent judgment shall be entered in an action in which the United States is not a party prior to 45-days following the receipt of a copy of the proposed consent judgment by the Attorney General and the Administrator."